

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

TYRONE P. JAMES,

Plaintiff

V.

YORK CITY POLICE
DEPARTMENT, AGENT
JAMES H. MORGAN, DET.
RICHARD PEDDICORD, DET.
RAYMOND E. CRAUL, SGT.
GENE FELS, DET. KESSLER, DET.
GLOWCZESKI, AGENT BRIAN
WESTMORELAND, AGENT RANDY SIPES,
C/O BAYLARK,

Defendants

CIVIL ACTION NO. 1:01-1015

(KANE, D.J.)
(MANNION, M.J.)

FILED
HARRISBURG, PA

APR 11 2005

MARY E. D'ANDREA, CLERK
Per *MD*
Deputy Clerk

MOTION FOR APPOINTMENT OF COUNSEL

NOW COMES, Plaintiff's Tyrone P. James, pro se, respectfully moves this Honorable Court, for the, "Assignment Of Counsel," to represent him in the above captioned matter, and avers the following in support thereof:

1. Plaintiff is presently confined at the State Correctional Institution at Rockview, Box A, Bellefonte, PA 16823

2. Plaintiff is unable to obtain funds from anyone including his family and associates by way of compensation for counsel, and represent that the answer to the following question are true and correct to the best of his personal knowledge, information and belief,

(A) Do you have any money? yes () No (x) if so, how much? 0

1) In the custody of the Warden? Yes () No (x)

2) Any where? None

(B) Do you own an automobile? Yes () No (x)

(C) Do you own any Real Estate? Yes () No (x)

(D) Do you own any other property or do you have any other assets? Yes
() No (x)

1) If yes, state description and value of property; None

(E) Does anyone owe you money? Yes () No (x)

1) If yes, state the name of person(s), address and the amount he/she owes you; None

(F) If married, what is the name, address and age of your wife? Ms. Lavern James, 565 West Market Street, York, Pa 17404; Age, 39.

(G) Do you have any children? Yes (x) No ()

(3) Plaintiff is unable to obtain Counsel to defend himself in this matter for the reason that he is without funds and is presently incarcerated. See Exhibit A; Letter from Attorney.

(4) I have not been previously represented by an attorney in this above captioned matter.

WHEREFORE, Plaintiff prays that this Honorable Court Grant this application and assign Counsel to represent him in the entitled civil matter without a fee to the plaintiff.

Date: April 1, 2005.

Respectfully submitted,

Tyrone P. James

Tyrone P. James, (Plaintiff)

EX 9451
P.O. Box A
Bellevue, PA 15823-0820

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES,

Plaintiff

vs.

YORK CITY POLICE
DEPARTMENT, AGENT
JAMES H. MORGAN, DET.
RICHARD PEDDICORD, DET.
RAYMOND E. TRAMU, SGT.
GENE FELS, DET. KESSLER, DET.
GEORCHESKI, AGENT BRIAN
WESTMORELAND, AGENT RANDY SIPES,
C/O DAYLARK,

Defendants

CIVIL ACTION NO. 1:01-1015

(NAME, D.J.)
(MANNION, M.J.)

FILED
HARRISBURG, PA

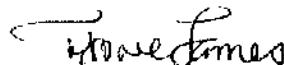
APR 11 2005

MARY E. DIANDREA, CLERK
Per
Deputy Clerk

VERIFICATION

I, Tyrone P. James, the Plaintiff, pro se, verifies that the statements made in the foregoing documents are true and correct to the best of my personal knowledge, information and belief. I understand that any false statements herein are made subject to the penalties of 18 U.S.C. § 1745, relating to unsworn falsification to authorities.

Date: April 1, 2005



Tyrone P. James

PK 0451

P.O. Box A

Pelleport, PA 16823-0000

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES	:	
Plaintiff	:	CIVIL ACTION NO. 1:01-CV-01015
v.	:	(KATE, D.F.)
	:	(MANNION, S.J.)
YORK COUNTY SHERIFF'S	:	
DEPARTMENT, AGENT	:	
JAMES H. MORGAN, DET.	:	
RICHARD PEDDICORD, DET.	:	
RANDOLPH L. CRIST, AGT.	:	
GENE FELS, DET. KESSLER, DET.	:	
GLOUCESTER COUNTY SHERIFF	:	
WESTMORELAND, AGENT RANDY SIPES,	:	
C/O RAYMOND	:	
Defendants	:	

PROOF OF SERVICE

I, the undersigned hereby certify that a true and correct copy of the foregoing application was served upon the parties listed below by United States First-Class Mail. I further understand that any false statements made herein are subject to the penalties of 28 U.S.C. § 1746.

Service was made this 1st day of April, 2005.

Timothy P. Keating, Esquire
Office of Attorney General
15th Floor, Strawberry Spire
Harrisburg, PA 17120

Donald G. Reihart, Esquire
3015 Eastern Boulevard, Suite 204
York, PA 17402-3025

Carole J. McGraw, Esquire
110 W. A. Street, Suite 1100
San Diego, CA 92101

Frank J. Lavery, Jr., Esquire
Devon M. Jacob, Esquire
LAVERY TWERTY YOUNG
& PATTERSON P.C.
P.O. Box 1245, 100 Vine Street
Harrisburg, PA 17108-1245

Tyrone James

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820

Tyrone P. James
EX 2451
P.O. Box A
Ballwin, PA 19320-0002

April 1, 2005

Clerk of Court
United States District Court
Middle District of Pennsylvania
228 Walnut Street
P.O. Box 243
Harrisburg, PA 17109

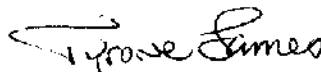
Civil Action NO: 1:01-CV-1015

Dear Sir/Madam

Good day and Hello! Enclosed you will find a Motion, "For Appointment Of Counsel." Please enter docket and include a copy of the docket entry, the mentioned civil action. Thank you.

Once again, thank you for your help and consideration with this matter.

Sincerely



Tyrone P. James
EX 2451

cc:file.

Tyrone P. James
EX 9451
P.O. Box A
Bellefonte, PA 16823-0820

April 1, 2005

Honorable Judge, Yvette Kane
United States District Court
Middle District Of Pennsylvania
228 Walnut Street
P.O. Box 983
Harrisburg, PA 17103

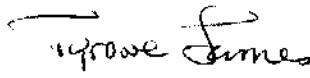
Civil Action NO: 1:01-CV-1015

Dear Honorable Judge, Yvette Kane,

Good day and Hello! Enclosed you will find a motion, "For Appointment Of Counsel," filed with the Clerk of Courts, United States District Court For the Middle District of Pennsylvania. Additional copies were forward to Attorneys for the Defendants.

Once again, thank you for your help and consideration with this matter.

Sincerely


Tyrone P. James
EX 9451

CC/File.

INMATE MAIL
PA DEPT OF
CORRECTIONS

Tyone James

EX 9451

P.O. Box A

Belleville PA 17823-0820

Office of The Clerk
United States District Court
For Middle District of Penn
228th Walnut Street
PO Box 983
Harrisburg, PA 17108

Legal mail